

From: [Corey Stern](#)
To: [Devine, Alaina N.](#)
Cc: [Moshe S. Maimon](#); [Kent, David C.](#); [Mason, Wayne B.](#); [Erickson, Philip](#); [Travis.Gamble@faegredrinker.com](#); [Campbell, James M.](#); [Dan Stein](#); [Ter Molen, Mark](#); [Christian, Marcus A.](#); [bush@bsplaw.com](#); [Dupre, Kristin M.](#); [Howe, Christopher R.](#)
Subject: Re: Flint: VNA's Notice of Filing Depos and Motion to Supplement the Record
Date: Wednesday, August 17, 2022 2:47:39 PM

You have no need for our slides. There was a mistrial.

Corey M. Stern
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On Aug 17, 2022, at 8:43 PM, Devine, Alaina N. <ADevine@campbell-trial-lawyers.com> wrote:

Corey and Moshe,

I am following up on my below follow-up request for the slides that you used during closing. Please let me know if a meet a confer on this issue is needed or if you will require us to file a motion to compel.

Thank you,

Alaina N. Devine
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From: Devine, Alaina N.

Sent: Wednesday, August 10, 2022 6:22 PM

To: Stern, Corey <CStern@levylaw.com>; Moshe S. Maimon <MMaimon@levylaw.com>

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Subject: Flint: VNA's Notice of Filing Depos and Motion to Supplement the Record

Corey and Moshe,

Following up on our conference with Judge Levy last week, we intend to file a notice on the docket with the deposition matrix rulings from Judge Levy. This would apply to the following witnesses: Rosenthal, Earley, Johnson, Gadis, Ambrose, Croft, Crooks, Walker, Edwards, Gnagy, Del Toral, Snyder, Nicholas, Chen, and Workman. We intend to file the corresponding deposition transcripts under seal, consistent with our discussion.

Also consistent with the discussion last week, we intend to file a Motion to Supplement the record with VNA's submissions and the Court's e-mail ruling on the Fifth Amendment, VNA's submission on Alternative Causes (as referenced in ECF No 702), VNA's submission and the Court's February 14, 2022 e-mail chain ruling on the OIG and Task Force Reports, VNA's submission on the EPA Administrative Order, VNA's submission on the late-disclosed witnesses, and the various versions of the jury instructions and verdict forms. These items were part of what was previously sent to you with our original request, but we have narrowed the scope per Judge Levy's directives and after reviewing the docket. Pursuant to local rule 7.1, please let us know if you assent to this motion.

Finally, I am requesting on behalf of VNA, for a third time, the slides used by plaintiffs and LAN in the closing arguments. Please send those to me by email to be marked for identification.

Thank you,

Alaina N. Devine
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